

# EXHIBIT B-5

**UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;  
ACCURATE BACKFLOW AND  
PLUMBING SERVICES, INC.;  
HOMESTEAD HEATING &  
PLUMBING, LLC; AIRIC'S  
HEATING & AIR CONDITIONING,  
INC.; PRIME SOURCE PLUMBING  
& HEATING CORP.; RYAN  
PLUMBING, INC.; MAZZOLA  
PLUMBING HEATING & GAS  
FITTING, INC.; SOUTH SHORE  
HEATING AND PLUMBING, INC.;  
ALL KNIGHT PLUMBING,  
HEATING AND AIR  
CONDITIONING, INC.; PLUMB  
PERFECTION, LLC, individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF JOSEPH G. VEENSTRA IN SUPPORT OF PLAINTIFF'S  
UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT AND  
ATTORNEYS' FEES, EXPENSES AND SERVICE AWARD**

I, Joseph G. Veenstra, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of Johns, Flaherty & Collins, S.C. (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiff and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are Joseph G. Veenstra and Ellen M. Atterbury. Under the direction of Interim Class Counsel, the Firm undertook the following assignments: meeting with the owners and employees of class representative, Prime Source Plumbing & Heating, Inc., obtaining and reviewing records and assisting with e-discovery on-site, attending our client's deposition, assisting with provision of, editing, and reviewing pleadings with our client, discovery assistance on site.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at average historical rates for these attorneys along with a collective entry for the Firm's paralegals:<sup>1</sup>

<u><b>Attorney</b></u>	<u><b>Hours Billed</b></u>	<u><b>Amount</b></u>	<u><b>Hourly Rate</b></u>
<b>Joseph G Veenstra</b>	20.3	\$8,830.50	\$435.00
<b>Joseph G. Veenstra</b>	18	\$5,610.00	\$300.00
<b>Ellen M. Atterbury</b>	0.5	\$175.00	\$350.00
<b>Ellen M. Atterbury</b>	6.6	\$1,980.00	\$300.00

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

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<sup>1</sup> If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys and paralegals, as well as the Firm's expenses.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$36.20 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

<b>CATEGORY</b>	<b>EXPENSE AMOUNT</b>
Copying, Printing and Scanning	\$36.20
Telephone and Conference Calls	
Messenger and delivery services	
Service of Process	
Carfare, Travel and Meals	
Expert Fees	
Court Reporters and Transcripts	
Legal Research and Filing Fees	
Mediators	

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November 11, 2020

s/ Joseph G. Veenstra  
 Joseph G. Veenstra, (1028139)  
 Johns, Flaherty & Collins, S.C.  
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 La Crosse, WI 54601